

Exhibit FF

DR. WILLIAM LONGO, on 04/21/2021

CHRISTINA G. PRUDENCIO vs. JOHNSON & JOHNSON, et al.

Page 1

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR

2 THE COUNTY OF ALAMEDA

3 CHRISTINA G. PRUDENCIO,

)

4 Plaintiff,

)

5 vs.

) Case No.

6 JOHNSON & JOHNSON; JOHNSON)

& JOHNSON CONSUMER, INC.)

(Sued individually and as)

successor-in-interest to)

JOHNSON & JOHNSON CONSUMER)

COMPANIES, INC.), et al.,)

10 Defendants.

)

Certified Transcript

11 _____) (Pages 1 - 228)

12

13

14 DEPOSITION OF EXPERT WITNESS

15 DR. WILLIAM LONGO

16 WEDNESDAY, APRIL 21, 2021

17

18

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20

21

22

23

24 Reported by: KAREN C. WATERS, REGISTERED

25 PROFESSIONAL REPORTER

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1 SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR

2 THE COUNTY OF ALAMEDA

3 CHRISTINA G. PRUDENCIO,)
4)
5 Plaintiff,)
6)
7 vs.) Case No.
8) RG20061303
9 JOHNSON & JOHNSON; JOHNSON)
10 & JOHNSON CONSUMER, INC.)
11 (Sued individually and as)
12 successor-in-interest to)
13 JOHNSON & JOHNSON CONSUMER)
14 COMPANIES, INC.), et al.,)
15)
16 Defendants.)
17 _____)

18
19
20
21 DEPOSITION OF DR. WILLIAM LONGO, taken on
22 behalf of Defendants, remotely via
23 videoconference, commencing at 9:05 a.m. (PST),
24 Wednesday, April 21, 2021, before Karen C.
25 Waters, Registered Professional Reporter.

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1 APPEARANCES: (Via videoconference) :

2
3 For Plaintiff:

4 KAZAN, MCCLAIN, SATTERLEY & GREENWOOD
5 BY: IAN A. RIVAMONTE, ESQ.
6 Jack London Market,
7 55 Harrison Street
8 Suite 400
9 Oakland, California 94607
10 (510) 302-1000
11 irivamonte@kazanlaw.com

12 For Defendants LONGS DRUG STORES CALIFORNIA,
13 L.L.C., on behalf of LONGS DRUG STORES
14 CALIFORNIA, INC. (Erroneously sued as LONGS DRUG
15 STORES CALIFORNIA, L.L.C., individually and as
16 successor-in-interest, parent, alter ego, and
17 equitable trustee of LONGS DRUG STORES
18 CALIFORNIA, INC.); SAFEWAY INC.; LUCKY STORES,
19 INC.; and ALBERTSONS COMPANIES, INC.:

20 BARNES & THORNBURG LLP
21 BY: MITCHELL R. CHARHALIS, ESQ.
22 2029 Century Park East
23 Suite 300
24 Los Angeles, California 90067
25 (310) 284-3768
mcharhalis@btlaw.com

26 For Defendants JOHNSON & JOHNSON and JOHNSON &
27 JOHNSON CONSUMER INC.:

28 KING & SPALDING LLP
29 BY: KEVIN HYNES, ESQ.
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31 34th Floor
32 New York, New York 10036
33 (212) 790-5349
34 khynes@kslaw.com

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1 APPEARANCE (Via videoconference) (continued) :

3 For Defendant PERRIGO COMPANY OF TENNESSEE:

4 GOODELL, DEVRIES, LEECH & DANN, LLP
BY: JEFFREY J. HINES, ESQ.
5 One South Street
20th Floor
6 Baltimore, Maryland 21202
(410) 783-4041
7 jjh@gdldlaw.com

8

9 For Defendant VI-HON, INC.:

10 REED SMITH LLP
BY: SHANA E. RUSSO, ESQ.
11 506 Carnegie Center
Suite 300
12 Princeton, New Jersey 08540-7839
(609) 987-0050
13 srucco@reedsmitth.com

14

15 Also Present:

16 Bret Hampton, the videographer.

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1 ISO PLM method. Sample preparation for the
2 heavy liquid density is not the ISO method, but
3 that's what I -- what we had been calling the
4 CSM method.

5 Q. Okay.

6 A. So it's two different things. There's
7 sample prep, but then there's the analysis to
8 determine if chrysotile is present.

9 Q. Right. So that analysis follows the ISO
10 22262-1 methodology?

11 A. Yes.

12 Q. And Paul Hess, he was the individual who
13 performed all of the PLM analyses as part of
14 this report that was marked as 3F as well as the
15 part that was marked as 3G?

16 A. Yes.

17 Q. Okay. And I guess as part of this
18 report, 3F, Mr. Hess identified what he
19 identified as chrysotile at levels varying
20 from -- without the liquid separation
21 technique -- levels from .006 to .009 area
22 percent weight, correct?

23 A. I believe that's correct. I know you're
24 just reading it off the results, but I always
25 feel silly if I agree and then it's not. That

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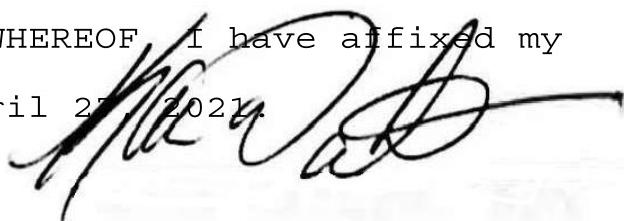
1 die.)

2 REPORTER'S CERTIFICATE

3 I, KAREN WATERS, Registered Professional
4 Reporter, do hereby certify that previous to the
5 commencement of the examination, the said
6 DR. WILLIAM LONGO, was duly sworn by me to
7 testify to the truth in relation to the matters
8 in controversy between the parties hereto; that
9 the said deposition was taken in machine
10 shorthand by me at the time and place aforesaid
11 and was thereafter reduced to typewritten form;
12 that the foregoing is a true transcript of the
13 questions asked, testimony given, and
14 proceedings had.

15 I further certify that I am not employed
16 by, related to, nor of counsel for any of the
17 parties herein, nor otherwise interested in the
18 outcome of this litigation.

19 IN WITNESS WHEREOF I have affixed my
20 Signature this April 27, 2021



21
22 Karen Waters

23 _____ Reading and Signing was requested.

24 Reading and Signing was waived.

25 _____ Reading and Signing is not required.